

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

JESSICA JONES, MICHELLE VELOTTA,
and **CHRISTINA LORENZEN** on Behalf of
Themselves and All Others Similarly Situated,

Plaintiffs,

v.

**Varsity Brands, LLC; Varsity
Spirit, LLC; Varsity Spirit Fashion
& Supplies, LLC; U.S. All Star
Federation, Inc.; Jeff Webb;
Charlesbank Capital Partners
LLC; and Bain Capital Private
Equity,**

Defendants.

Case No. 2:20-cv-02892-SHL-atc

Jury Trial Demanded

**NOTICE OF STIPULATION AND [PROPOSED] ORDER ESTABLISHING A
PLAINTIFFS' DISCOVERY COORDINATION COMMITTEE**

WHEREAS, on August 13, 2020, *Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.* (“*Fusion*”)¹ was filed in this Court, naming Varsity Brands, LLC (“Varsity Brands”); Varsity Spirit, LLC (“Varsity Spirit”); Varsity Spirit Fashion & Supplies, LLC (“Varsity Fashion”) (collectively, “Varsity”), and U.S. All Star Federation, Inc. (“USASF”) as Defendants;

WHEREAS, on August 25, 2020, *Kathryn Anne Radek, et al. v. Varsity Brands, LLC, et al.* (“*Radek*”) was filed in this Court against the same Defendants²;

WHEREAS, on September 18, 2020, the Court consolidated the *Fusion* and *Radek* class actions;

WHEREAS, on October 27, 2020, *American Spirit and Cheer Essentials, Inc., et al. v. Varsity Brands, LLC, et al.* (“*American Spirit*”), which named the same core Defendants in

¹ 2:20-cv-02600-SHL-cgc (W.D. Tenn.).

² 2:20-cv-02649-SHL-atc (W.D. Tenn.).

addition to several others, was transferred to this Court from the United States District Court for the Northern District of Georgia³;

WHEREAS, on December 10, 2020, *Jessica Jones, et al. v. Bain Capital Private Equity et al.* (“*Jones*”) (together with *Fusion* and *American Spirit*, the “Related Class Actions”) was filed in this Court, naming the same core Defendants, in addition to several others⁴;

WHEREAS, on December 16, 2020, the Court held a Scheduling Conference attended by counsel for Plaintiffs in all three Related Class Actions, at which the Court encouraged counsel to work together to devise a plan for coordinating discovery, to be submitted to the Court by January 5, 2021;

WHEREAS, counsel for the Plaintiffs in the Related Class Actions met and conferred and agreed upon a Stipulation and [Proposed] Order Establishing a Plaintiffs’ Discovery Coordination Committee, signed by all counsel, under which counsel will work cooperatively to facilitate an efficient course of discovery in the Related Class Actions, which was submitted to the Court in the *Fusion* class action on December 30, 2020.

Accordingly, the *Jones* Plaintiffs hereby file this Notice of Stipulation and [Proposed] Order Establishing a Plaintiffs’ Discovery Coordination Committee, a copy of which is attached hereto as Exhibit A.

³ 2:20-cv-02782-SHL-atc (W.D. Tenn.).

⁴ 2:20-cv-02892-SHL-cgc (W.D. Tenn.).

Respectfully submitted,

Dated: January 5, 2021

Joseph R. Saveri *
Steven N. Williams *
Kevin E. Rayhill *
Elissa A. Buchanan *
JOSEPH SAVERI LAW FIRM, INC.
601 California Street, Suite 1000
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
Email: jsaveri@saverilawfirm.com
swilliams@saverilawfirm.com
krayhill@saverilawfirm.com
eabuchanan@saverilawfirm.com

By: /s/ Joseph R. Saveri
Joseph R. Saveri

Van Turner (TN Bar No. 22603)
Katrice Feild (TN Bar No. 31263)
BRUCE TURNER, PLLC
2650 Thousand Oaks Blvd., Suite 2325
Memphis, Tennessee 38118
Telephone: (901) 290-6610
vturner@bruceturnerlaw.net
katrice@bruceturnerlaw.net

Daniel E. Gustafson
Daniel C. Hedlund
Daniel J. Nordin
Ling S. Wang
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dnordin@gustafsongluek.com
lwang@gustafsongluek.com

Attorneys for Individual and Representative Plaintiffs

* Admitted *pro hac vice*